

Public Service Commission of Wisconsin  
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Ex.-WEC-Lauber-4

Item	Witness	Category	Condition	Proposed Language	WEC Comments on Conditions	Rebuttal Witness(es)
1	Staff--Bartels	Accounting	Accounting for Transaction Costs	All transaction costs incurred by or allocated to WEPCO, WG, and WPSC shall be specifically identified and allocated to non-utility accounts.	Accepted	
2	CUB--Hahn	Accounting	Acquisition Premium	Deny direct and indirect recovery of the acquisition premium.	See Item 3	
3	Staff--Hubert [WEC]	Accounting	Acquisition Premium	WEC Energy may not recover any acquisition premium from the utility ratepayers. No acquisition premium even though not recoverable in rates, may be allocated to WEPCO, WG, or WPSC account.	Accepted	
4	WIEG--Kollen	Accounting	Acquisition Premium	Deny recovery of acquisition premium in any form, whether write-up of assets or goodwill regardless of whether incurred before or after transaction closes and regardless of which entity records the costs.	See Item 3	
5	Jobs4WI--Vock	Accounting	Power the Future ROE	Adjust the ROE in the current PTF leases to match the level determined as reasonable in each rate case.	Opposed, with explanation	Leverett
6	Jobs4WI--Vock	Accounting	Power the Future ROE	Mitigate the costs of excess generation capacity by allocating a portion of the PTF lease costs to wholesale operations in lieu of retail operations and/or foregoing recovery of ROE and PTF lease payments for assets that are not used and useful.	Opposed, with explanation	Leverett
7	CUB--Hahn	Accounting	Proof of Exclusion	Identify all transaction, transition, and acquisition premium costs in an accounting system.	See Item 8	
8	Staff--Bartels	Accounting	Proof of Exclusion	After closing, and in any rate proceeding decided within six years after the Transaction closing the Applicant shall provide proof that no transaction costs are included in historical expenses of the operating utility or in the determination of revenue requirement.	Accepted	
9	WIEG--Kollen	Accounting	Proof of Exclusion	Identify all transaction and transition costs in accounting system.	See Item 8	
10	Staff--Larson	Accounting	Purchase Accounting/Push-down Accounting	Push-down accounting related to the Reorganization shall not be imposed upon or utilized by the Wisconsin Operating Companies for any purpose, including for financial and regulatory accounting, and ratemaking.	Accepted, with clarification	Lauber
11	WIEG--Kollen	Accounting	Purchase Accounting/Push-down Accounting	Deny "push down" of acquisition premium and transaction costs for WEPCO and WPSC ratemaking purposes regardless of which entity records the costs, GAAP accounting requirements, and whether incurred before or after transaction closes.	See Item 10	Lauber

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12	Staff--Bartels	Accounting	Transaction Cost Definition	Approximate acquisition-related transaction costs shall include:  \$22 million to investment bankers; \$14.4 million legal; \$1.5 million legal – debt offering; \$1 million regulatory affairs; \$1 million transfer agent fees; \$1 million printers fees; \$750,000 SEC Registration; \$650,000 rating agency fees; \$350,000 tax and other financial consulting work; \$250,000 audit fees for S-4 filing; \$100,000 communications; \$47.6 million in pure change-in-control payments; a portion of \$140 million “cash-out” payments that vests at closing; and \$1.9 million to \$5.6 million annually for six years of directors and officers tail insurance or equivalent policy.	Accepted	
13	CUB--Hahn	Accounting	Transaction Cost Recovery	Deny recovery of all transaction costs regardless of whether incurred before or after the transaction closes.	See Item 14	
14	Staff--Bartels [WEC]	Accounting	Transaction Cost Recovery	The Applicant shall expense the cost to achieve the acquisition as incurred. WEPCO, WG, and WPSC may not recover any acquisition-related transaction costs from the Wisconsin retail jurisdictions.	Accepted, with clarification	Lauber
15	WIEG--Kollen	Accounting	Transaction Cost Recovery	Deny recovery of transaction costs in any form, regardless of which entity records the costs and regardless of whether incurred before or after transaction closes.	See Item 14	
16	Staff--Bartels	Accounting	Transaction Costs and Fuel Rules	Transaction costs should not be considered in determining excess revenues under Wis. Admin. Code § PSC 116.07(6) or any other Commission determination in which earnings is a consideration.	Accepted	
17	Staff--Bartels	Affiliated interest	Affiliated Interest Agreements	WEPCO, WG and WPSC shall file new affiliated interest agreements for new qualifying relationships and for existing agreements that will have changes to names or services after the merger. This includes but is not limited to intercompany guarantees and lending arrangements, information sharing, technology and potentially gas portfolios.	Accepted, with clarification	Lauber
18	WIEG--Kollen	Affiliated interest	Affiliated Interest Cost Recovery	Deny recovery of duplicate costs incurred by WE and Integrys service companies under Interim Affiliate Agreements.	Accepted, with clarification	Lauber

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19	GLU--Kothari	ATC	Divestiture of ATC Ownership	Portion of WEC's ownership interest in ATC be "divested and made available at a fair market value to other existing ATC owners, in particular cooperatives and municipals."	Opposed, with explanation	Leverett
20	GLU--Lowry	ATC	Divestiture of ATC Ownership	Divest between 10-12% of ATC.	Opposed, with explanation	Leverett
21	Jobs4WI--Vock	ATC	Divestiture of ATC Ownership	WEC should divest its controlling interest in the ATC.	Opposed, with explanation	Leverett
22	Staff--Pilo	ATC	Divestiture study	WEC Energy shall, within a year of the consummation of the acquisition, file with the Commission a full-fledged independent legal, investment banking, and policy divestiture analysis for the Commission to consider. WEC Energy will pay for the rigorous analysis. WEC Energy will submit several choices for vendors and the Commission shall choose the analysts.	Opposed, with explanation	Leverett
23	GLU--Kothari	ATC	Makeup of ATC Board	ATC Board seats be filled by people from currently unrepresented entities.	Opposed, with explanation	Leverett
24	GLU--Lowry	ATC	Makeup of ATC Board	Guarantee a seat on ATC Board for currently unrepresented municipal utility or cooperative.	Opposed, with explanation	Leverett
25	Staff--Hubert	ATC	Ownership of Preferred Stock or another class of ATCMI or ATCLC voting securities	WEC Energy and its affiliates may not obtain additional voting interest in ATCMI and/or ATCLLC through the acquisition of ATCMI or ATCLLC securities, including, but not limited to ATCMI preferred stock.	Opposed, with explanation	Leverett
26	Staff--Hubert	ATC	Participation on ATCMI Board	WEC Energy and its affiliates, include those serving on the ATCMI board, may only nominate one candidate for the board of ATCMI and may not hold more than one board position.	Opposed, with explanation	Leverett
27	Staff--Hubert	ATC	Successor purchaser limitations	WEC Energy and its affiliates shall not sell or otherwise transfer its ownership interest in ATC (ATCMI and/or ATCLLC) except on terms which transfer the board position, board nomination, and voting securities ownership restrictions to the subsequent purchaser.	Opposed, with explanation	Leverett

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28	Staff--Hubert, Pilo	ATC	Treatment of Ownership Interest in ATC	<p>WEC Energy holdings in ATC shall not be restricted by an investment cap.</p> <p><i>or</i></p> <p>WEC Energy shall be restricted from participating in any capital calls until its ownership interest has been reduced to 34 percent. In the event that WEC Energy's ownership had not declined to 34 percent by the fifth anniversary of the acquisition date, WEC Energy shall divest itself of any ownership interest over 34 percent and subsequently maintain its ownership interest at or below that level.</p> <p><i>or</i></p> <p>Within 90 days of consummation of the acquisition, WEC Energy shall divest any ownership interest in excess of 34 percent.</p>	Opposed, with explanation	Leverett
29	GLU--Kothari	ATC	Voting of ATC shareholder interests	The 26% voting share we have identified in our voting restrictions be reserved for voting by "entities presently unrepresented on the ATC Board."	Opposed, with explanation	Leverett
30	GLU--Lowry	ATC	Voting of ATC shareholder interests	Put WEC's 26% voting share in ATC in a voting trust for municipal utilities and cooperatives.	Opposed, with explanation	Leverett
31	Staff--Hubert	ATC	Voting of ATC shareholder interests	WEC Energy voting, on all issues requiring ATCMI shareholder or ATCLLC member votes, shall be limited to the 34 percent share presently held by Integrys Energy.	Opposed, with explanation	Leverett
32	CUB--Hahn	Favored nation	Most Favored Nation Condition	"Most favored nation" status with respect to conditions in other jurisdictions.	Opposed, with explanation	Leverett
33	Staff--Hubert	Favored nation	Most Favored Nation Condition	Regardless of whether a Commission review is performed, the cost of any acquisition condition from another jurisdiction subsequently found to have an adverse cost impact on Wisconsin customers, shall be absorbed by WEC Energy without recourse to, or reimbursement by, WEPSCO, WPSC, or WG.	Opposed, with explanation	Leverett
34	WIEG--Kollen	Favored nation	Most Favored Nation Condition	Adopt a "most favored nation clause." In other words, any concessions agreed to or conditions imposed by regulators in other jurisdictions should be adopted in Wisconsin.	Opposed, with explanation	Leverett

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35	Staff--Hubert	Favored nation	Reopen to review impact of merger conditions from other jurisdictions	Consummation of the acquisition shall be conditioned upon a Commission review of acquisition conditions from all other jurisdictions having approval authority relating to various aspects of the acquisition, to determine whether further Commission conditions are subsequently required. The acquisition shall not be consummated until the earlier of 1) a Commission determination whether additional conditions are warranted, or 2) 30 days after the last jurisdiction approval is granted, in the event no Commission instigation of a review is begun within 30 days.	Opposed, with explanation	Leverett
36	Staff--Hubert, O'Donnell	Financial	Dividend Prohibition	An appropriate common stock equity floor, on a financial basis for WEPCO/WG/WPSC is 48.5/47/49 percent. It is just and reasonable that WEPCO/WG/WPSC apply for and receive Commission approval before it issues any common stock dividend, including the forecasted dividend, if after the payment of such dividends the actual common equity ratio, on a financial basis, would be below 48.5/47/49 percent. For purposes of calculating off-balance sheet equivalents, the test year average should be used. Furthermore any dividend declared and booked in a month where the equity falls below the floor will be presumed to have caused the equity reduction.	Accepted, with clarification	Lauber
37	Staff--Hubert, O'Donnell	Financial	Dividend Restriction	WEPCO/WG/WPSC may not pay dividends above those estimates deemed reasonable in their most recent rate proceeding without prior Commission approval, if, after the payment of such dividends, the actual average common equity ratio, on a financial basis, would be below the test year authorized level of 51.00/49.50/51.00 percent. WEPCO/WG/WPSC shall notify the Commission if any special dividend is contemplated.	Accepted, with clarification	Lauber
38	CUB--Hahn	Financial	Dividend Restriction	Restrict dividends from Wisconsin regulated subsidiaries to the parent company. For example, in any future year, the payout ratio should not exceed each company's average payout ratio for the most recent four years without Commission approval.	Opposed, with explanation	Lauber
39	CUB--Hahn	Financial	Earnings Cap	An earnings cap on the annual actual earnings of WEPCO, WG, and WPSC that would return to customers any earnings above each company's authorized return on equity (currently 10.2%, 10.3%, and 10.2%, respectively).	Opposed, with explanation	Lauber
40	WIEG--Kollen	Financial	Earnings Cap	Adopt a savings surcredit mechanism based on Wepco and WPSC's actual earnings in excess of their authorized returns on equity.	Opposed, with explanation	Lauber

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41	WIEG--Kollen	Financial	Increased Capital Costs Associated with Holding Company System Actions	Deny recovery of increased financing costs due to rating agency downgrades.	Opposed, with explanation	Lauber
42	Staff--Hubert, O'Donnell	Financial	Increased Capital Costs Associated with Holding Company System Actions	Any increased capital costs determined by the Commission to be related to downgrading or other credit degradation of the holding company and/or non-utility affiliates, should be removed from the cost of capital for WEPCO, WG, and/or WPSC.	Opposed, with explanation	Lauber
43	Staff--Hubert, O'Donnell	Financial	Money Pool and Guarantees	WEPCO, WG, and WPSC may not lend money to, or guarantee the obligation of, WEC Energy nor any affiliate with which it is in the holding company system. WEPCO, WG, and WPSC may not lend money to each other, nor guarantee each other's obligation without Commission authorization of the arrangements.	Accepted, with clarification	Lauber
44	CUB--Hahn	Financial	Money Pool and Guarantees	Prohibit each Wisconsin regulated subsidiary from loaning funds to or borrowing funds from the post-acquisition parent or other regulated subsidiaries.	See Item 43	Lauber
45	CUB--Hahn	Financial	Separate Credit Rating and Debt	Require that each Wisconsin regulated subsidiary maintain its own credit rating and portfolio of debt that is independent of the post-acquisition parent.	Accepted, with clarification	Lauber
46	Staff--Hubert, O'Donnell	Financial	WEC debt reduction plan	WEC Energy shall file with the Commission, within 90 days of the consummation of the acquisition, a report detailing the debt held at the WEC Group holding company and Integrys sub-holding company levels, its relationship to total holding company debt and the company's plans to reduce the debt. WEC Energy shall file with the Commission updated reports every 90 days until the debt at the holding companies declines to 15 percent of total debt.	Accepted, with modification	Lauber
47	Staff--Detmer	Generation	Generation Plan	The utilities shall submit a joint integrated resource plan based on EGEAS modeling that analyzes various generating alternatives similar to the individual utility filings recently filed with the Commission. This integrated resource plan shall be filed within 90 days of the date of the closing.	Accepted, with modification	Leverett
48	CUB--Hahn	Generation	Generation Plan	Clarification of whether WEC is offering to delay Fox Energy Center as a condition of approval.	Opposed, with explanation	Leverett

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49	WIEG--Kollen	Generation	Generation Plan	Withdrawal or delay of WPSC's application for a new natural gas-fired power plant known as Fox Energy Center 3. Going forward, WPSC and WEPCO must work jointly on their resource planning and generating resources.	Opposed, with explanation	Leverett
50	Staff--Bartels	Holding company	Applicable Requirements	WEC Energy shall be subject to all applicable requirements of Wis. Stat. § 196.795 and to all of the conditions and requirements in any Commission order related to WEC and Integrys, including but not limited to the holding company formation orders and relevant merger orders.	Accepted	
51	Staff--Bartels	Holding company	Books and Records	All books and records of all entities in the corporate structure shall be readily available for Commission staff review in a reasonable manner, subject to approval by the Commission.	Accepted	
52	Staff--Bartels	Holding company	Notice of Filings	The Commission shall receive prompt notice of any filing by any of the holding company or its subsidiaries with other state commissions and FERC that is relevant to the Commission's authority and obligations.	Accepted, with clarification	Lauber
53	Staff--Nieto	Operations	Average Speed of Answer (ASA) -- Customer Service Call Center	WPSC shall maintain sufficient employees and equipment to achieve an average speed of answer of not more than 90 seconds, as required by Wis. Admin. Code § PSC 113.0503. The utility shall develop and submit to the Commission a plan for how WPSC would ensure that this requirement will be achieved.	Accepted in part, with explanation	Lauber
54	Staff--Nieto	Operations	Charitable Contributions	The current levels of discretionary charitable contributions will be maintained for three years following the closing of the Transaction.  <i>or</i>  No condition involving charitable contributions will be required.	Second proposed condition accepted	Lauber
55	Local 420--Maierle	Operations	Coordination of workforce plan	WEC "meet and confer with Local 420 and other employee representatives in developing a post-acquisition workforce plan."	Opposed, with explanation	Leverett



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56	Staff--Nieto	Operations	Customer Service Call Center	<p>WEC Energy shall notify the Commission if the number of permanent customer service employees at any of the call centers decreases by ten percent or more.</p> <p><i>or</i></p> <p>WEC Energy shall submit to the Commission for approval any plans to combine any customer service call center operations, before implementing the plans.</p> <p><i>or</i></p> <p>WEC shall notify the Commission of any plans to combine any customer service call center operations, 60 days before beginning to implement the plans. Such notice should include a cost/benefit analysis of the proposal.</p>	Opposed, with explanation	Lauber
57	Local 420--Maierle	Operations	Employee Headcount -- Five Years	Similar condition regarding headcount as offered in Illinois, but for a five-year period.	Opposed, with explanation	Leverett
58	Staff--Nieto	Operations	Gas Emergency Response Time	WPSC shall cooperate with Commission Staff on a study of WPSC's gas emergency response process. Within six months of the closing of the transaction, this joint study group will report back to the Commission. [WPSC has indicated that it would accept this condition.]	Accepted	
59	Staff--Nieto	Operations	Implementation of the ICE Project	WEC Energy shall notify the Commission if it develops any plans to implement part, or all, of the software developed through the ICE project, or some, or all, of the customer service policy changes proposed by WPSC, within 30 days of the plan being developed, or at least 30 days prior to any customer service policy changes.	Accepted, with clarification	Lauber
60	Staff--Hubert [WEC]	Operations	Labor retentions -- Represented employees	For 2 years from the date of closing of the Transaction, any reduction in headcount among employees in Wisconsin who are represented by a labor union will occur only as the result of voluntary attrition or retirement.	Accepted	

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61	Staff--Nieto [WEC]	Operations	Location of Corporate/ Holding Company Headquarters	<p>The headquarters of the post-merger WEC Energy Group and associated jobs will be located in Wisconsin and critical decisions affecting energy policy in Wisconsin will continue to be made in Wisconsin.</p> <p><i>or</i></p> <p>WEC Energy headquarters shall remain in Wisconsin, and any future plans to move the locations of the headquarters shall be brought before the Commission for approval.</p>	First proposed condition accepted; second opposed, with explanation	Lauber
62	Staff--Nieto [WEC]	Operations	Location of Operational Headquarters	<p>WEC Energy shall maintain operational headquarters in the cities of Milwaukee and Green Bay.</p> <p><i>or</i></p> <p>Any future plans to move the locations of the operational headquarters shall be brought before the Commission for approval.</p>	First proposed condition accepted; second opposed, with explanation	Lauber
63	Staff--Nieto	Operations	Low Income Programs	<p>WEC shall submit to the Commission for approval any plans to transition any Low Income Programs (LIPs) to a different operating entity or to combine any of the LIPs' operations or offerings, before implementing the plans.</p> <p><i>or</i></p> <p>WEC shall notify the Commission of any plans to transition any Low Income Programs (LIPs) to a different operating entity or to combine any of the LIPs' operations or offerings, 60 days before implementing the plans. Such notice should include a cost/benefit analysis of the proposal.</p> <p><i>or</i></p> <p>Commission staff shall review the programs in future rate cases, to ensure that the programs continue to produce optimal benefits.</p>	Third proposed condition accepted	Lauber
64	Staff--Hubert [WEC]	Operations	Merger integration plans	WEC shall submit to the Commission, upon development and prior to implementation its merger integration plans.	Opposed, with explanation	Leverett
65	Jobs4WI--Vock	Rates	High Voltage Tariff	Allow high-voltage customers to purchase electric power at retail tariff prices that shadow wholesale power prices to make Wisconsin's industry competitive again.	Opposed, with explanation	Leverett

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66	WIEG--Kollen	Rates	Levelization of WEPCO and WPSC Rates	Prohibit subsidization or "levelization" of the rates between WEPCO and WPSC.	See Item 68	Lauber
67	GLU--Lowry	Rates	Levelization of WEPCO and WPSC Rates	Prevent restructuring combined company in any way that would eliminate the independent subsidiary status of the electric utilities, resulting in levelized rates, for five years.	See Item 68	Lauber
68	Staff--Hubert [WEC]	Rates	Levelization of WEPCO and WPSC Rates	For [5 to 10] years from the consummation of the acquisition, before filing for approval of any legal merger of utilities or "levelization" of rates between utilities, WEC Energy shall work with Commission staff and other affected parties to develop a proposal that is acceptable to the parties.	Accepted, with clarification	Lauber
69	Staff--Bartels	Service company	Access to Books and Records	The Commission shall have full access to the books and records of the service company as provided in Wis. Stat, §§ 196.52 and 196.795(5).	Accepted	
70	Staff--Bartels	Service company	Change in Allocations to Wisconsin Operating Companies	If, in the future, WEC Energy and/or any of its subsidiaries are down-sized in any significant way, the absolute cost allocation to WEPCO, WG, and WPSC shall not increase unless the utilities demonstrate that the cost allocation is just and reasonable.	Opposed, with explanation	Lauber
71	Staff--Bartels	Service company	Effectiveness of Affiliated Agreements	The parent holding company or its subsidiaries shall not elect to have the FERC review pursuant to Section 1275 of EPACT 2005, 42 U.S.C. § 16462, the allocation of costs for goods and services provided by the service company, until the Commission has reviewed and taken action on the affiliated interest transactions and agreements associated with the service company of amendments thereto. If the Commission has not completed its review and approval within a reasonable time after the Commission determined an amendment to the service company agreement is complete, the entities may seek such FERC review after giving the Commission 60 days' prior written notice.	Accepted	
72	Staff--Bartels	Service company	Independent Audit	An independent audit of the service company and its transaction shall be performed within two years after closing, and thereafter every three years. The Commission would select the auditor and have full control over the audit work (scope, supervision, etc.) with the audit product being a Commission product. WEC Energy will be required to provide the Commission a list of all external audit firms the holding company system has contracts with, and would be billed for the audit cost.	Opposed, with explanation	Lauber
73	Staff--Bartels	Service company	Jurisdiction	The Commission shall as a condition of acquisition approval take continuing jurisdiction over the service company structure.	Accepted	

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74	Staff--Bartels	Service company	Performance of Services	In its performance of services, the service company:  (a) shall follow applicable federal and state regulation, including codes and standards of conduct; (b) shall not give one or more entities in the corporate structure a competitive advantage in relevant markets; (c) shall not subsidize WEPCO, WG and/or WPSC or cause WEPCO, WG and/or WPSC to subsidize an affiliate; and (d) may include a return on its net assets at a rate no higher than the prevailing weighted cost of capital for WEPCO, WG and/or WPSC.	Accepted, with clarification	Lauber
75	Staff--Bartels	Service company	Service Limitations	The service company shall be limited to performing services where there are efficiencies and economies of scale that could not be achieved if the services were not performed by the service company.	Accepted, with clarification	Lauber
76	Staff--Bartels	Service company	Third Party Services	The service company may not provide services to companies that are not part of the holding company system without the Commission's approval. The service company may temporarily provide transition services to an entity that is transferred to a third party. The service company shall apply any earnings as a deduction to the amounts reimbursable by its associated affiliates.	Accepted, with clarification	Lauber
77	Staff--Bartels	Synergy savings	Allocation of Synergy Savings	The Commission shall have approval authority over all allocation methodology and factors. If the allocation methodology and factors ultimately approved by the Commission differ from those approved in other jurisdictions the holding company should absorb any cost differentials.	Accepted, with clarification	Lauber
78	Staff--Larson, O'Donnell	Synergy savings	Bill Credits	WG, WEGO, VA Steam and MC Steam shall, as a condition of Commission approval of the acquisition, provide bill credits to all ratepayers either at the time of or shortly after the acquisition is consummated in the following amounts:  Wisconsin Gas: \$2,095,000 to \$4,189,000 WEGO: \$1,251,000 to \$2,502,000 VA Steam: \$339,000 to \$679,000 MC Steam: \$251,000 to \$502,000	Opposed, with explanation	Lauber, Leverett

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79	Staff--Bartels	Synergy savings	Cost Analysis -- Alternate	<p>The utilities (WEPCO, WG and WPSC), in any proceeding in which recovery, analysis and/or justification of acquisition savings is at issue, shall provide a detailed analysis of acquisition costs and savings for Commission review and approval. Such analysis would include:</p> <p>(a) an accounting of acquisition costs incurred by the combined company broken down by function to the extent possible,  (b) a calculation of acquisition savings accomplished by the combined company broken down by function to the extent possible, and  (c) where costs exceed savings for a particular function, a demonstration that the costs are reasonable and prudent.</p>	Accepted, with clarification	Lauber
80	Staff--Larson	Synergy savings	Tracking Transition Costs -- Alternate	If the Commission decides, instead of requiring bill credits, to freeze rates for a period of time, then for any new deferrals during the rate freeze period, recovery of such deferred amounts should only be allowed to the extent the utility is earning less than its authorized ROE, measured on a regulatory basis.	Opposed, with explanation	Lauber
81	Staff--Bartels	Synergy savings	Tracking Transition Costs -- Alternate	WEPCO, WG and WPSC shall be required to identify and track all acquisition-related transition costs incurred by the utility and allocated to in in a manner that is readily reviewable and auditable by the Commission at a location within Wisconsin.	Accepted	
82	CUB--Hahn	Synergy savings	Transition Cost Recovery	Deny deferral of and recovery of all transition costs.	Opposed, with explanation	Lauber
83	WIEG--Kollen	Synergy savings	Transition Cost Recovery	Deny deferral of transition costs.	Opposed, with explanation	Lauber
84	WIEG--Kollen	Synergy savings	Transition Cost Recovery	Deny ratemaking recovery of all transition costs. Flow through entirety of all actual savings to WEPCO and WPSC customers. If transition costs are allowed, then recovery should be limited to actual savings; savings in excess of transition costs flowed through 100% to customers. Alternatively, limit recovery of costs to projections as standalone entities for the next five years.	Accepted in part	Lauber
85	WIEG--Kollen	Synergy savings	Transition Cost Recovery	Deny recovery of all investment costs incurred to install new systems or integrate existing systems to operate on a consistent platform or use consistent software after the merger.	Opposed, with explanation	Lauber

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86	Staff--Bartels	Synergy savings	Transition Cost Recovery -- Alternate	WEPCO, WG, and WPSC can recover acquisition-related transition costs from the Wisconsin retail jurisdiction, only if and to the extent such costs are:  (a) incurred by or allocated to each of the utilities (each utilities portion or share of acquisition-related transition costs), (b) associated with financial benefits that each utility's ratepayers will receive as a result of the acquisition, and (c) the acquisition-related savings realized by each utility's ratepayers are equal to or greater than its acquisition-related transition costs.	Accepted, with clarification	Lauber
87	Staff--Bartels	Synergy savings	Transition Costs -- Alternate	For severance and/or early termination costs the Applicant shall provide detailed information in any rate proceeding on each instance of severance and/or early termination – the position, the reasoning, the costs and savings, etc., in sufficient detail for the Commission to make a determination on whether the cost is a transaction cost – unrecoverable or a transition cost.	Accepted, with clarification	Lauber
88	WIEG--Kollen	Synergy savings	Transition Costs -- Alternate	Deny recovery or deferral of all involuntary and voluntary severance costs.	Accepted, with clarification	Lauber
89	Jobs4WI--Vock	Synergy savings	Treatment of Deferrals	WEC should absorb the balance of WEPCO's transmission deferral account (approximately \$500 million) by the end of 2016 to remove the threat to WEPCO rate payers of rate shock in future years.	Opposed, with explanation	Lauber, Leverett
90	CUB--Hahn	Synergy savings	Treatment of Deferrals	Permanent write off of WEPCO's transmission escrow costs, thereby excluding these costs from rates.	Opposed, with explanation	Lauber, Leverett
91	Staff--Kettle, Larson	Synergy savings	Treatment of Deferrals	Direct WEPCO to write off all of its "old" transmission deferral of \$114 million, which is approximately \$68 million net of tax.	Opposed, with explanation	Lauber, Leverett
92	WIEG--Kollen	Synergy savings	Treatment of Deferrals	Write off WEPCO and WPSC's transmission escrows.	Opposed, with explanation	Lauber, Leverett

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93	Staff--Larson	Synergy savings	WPSC 2016 Test Year Reopener	<p>Synergy savings should be passed on to WPSC electric and gas customers through a limited rate case reopener for the 2016 test year. Items to be included in such limited reopener will be limited to:</p> <ol style="list-style-type: none"> <li>1. ReACT;</li> <li>2. Monitored fuel costs;</li> <li>3. System Support Resources (SSR) payments;</li> <li>4. Major power plant outage expenses; and</li> <li>5. Synergy savings of between \$4.4 and \$8.8 million for electric and between \$1.2 and \$2.4 million for natural gas.</li> </ol>	More analysis needed	Lauber, Leverett